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WILLS—CONSTRUCTION—EXTRINSIC EVIDENCE.—The testator bequeathed property to A, B, C. Hearing of their death, he inserted "or to their heirs" in the will, added "deceased" after the name of each legatee, and then republished the will. *Held*, the legacies will not lapse, since the additions indicate words of substitution. The court is entitled to put itself in the position of the testator, and to do this may resort to extrinsic evidence of the circumstances under which the additions were made. *In re Gilmor's Estate*, 26 Atl. Rep. 614 (Pa.).

In *Barnett's Appeal*, 2 Rawle, 28, "or his heirs" was held to amount to "and his heirs," on the ground that "the inference to be drawn from the use of a copulative instead of a disjunctive is too feeble." The principal case would, doubtless, have been similarly decided, had not the court availed itself of the extrinsic evidence, which clearly showed the legacies were never meant to lapse. The treatment of the case is clear and scientific. There is no confusing talk about "latent ambiguities," but the view is adopted which is gaining ground, that a written instrument may be construed in the light of all the extrinsic facts.

REVIEWS.

THE LAWS OF WILLS. By J. B. Cassoday, LL. D. West Publishing Co., St. Paul, 1893, 8vo. pp. 310.

Cassoday on Wills will prove valuable in making a comprehensive review of the subject at short notice. The practising lawyer will find it elementary and didactic rather than argumentative.

To the scholar it will prove unsatisfactory from its lack of logical division and scientific thoroughness, such a topic as the admission of extrinsic evidence in aid of the interpretation of a will being dismissed with the quotation of a single paragraph from Wigram.

As a statement of existing Wisconsin law, the book will be valuable in many instances to the students in Judge Cassoday's courses.

C. P. H.

LAW OF FOREIGN CORPORATIONS. A Discussion of the Principles of Private International Law and of Local Statutory Regulations applicable to Transactions of Foreign Companies. By William L. Murfree, Jr. pp. xlv, 376. St. Louis: Central Law Journal Co., 1893.

This is the first distinct treatise on a growing branch of the law, and one extremely important under our Federal system. The most interesting chapters are those relating to the right of a State to control within its borders a corporation chartered by another State as affected by the Constitution of the United States. A more thorough examination of the constitutional principles involved would have been valuable. However, the author does state with great force his objections to the present doctrine of the Supreme Court that a corporation is a citizen of the State creating it, so as to give jurisdiction to the Federal courts, although not a citizen within the privileges and immunity clause. This doctrine of the courts was by implication adopted by Congress in the Judiciary Act of 1887, where for the first time is found the term "corporation" in a statute giving jurisdiction,—a fact not mentioned by Mr. Murfree. But for the most part little more has been attempted in the book than a statement of the decisions. It must be said, however, that this has been well done. The arrangement is very good.

E B. B.